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April 14, 2017

**VIA ECF**

Honorable Freda L. Wolfson, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

Honorable Lois H. Goodman, U.S.M.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales  
Practices and Products Liability Litigation***  
**MDL No. 2738**

Dear Judge Wolfson and Judge Goodman:

This week, on April 12th, the parties met and conferred regarding the Preservation Order and outstanding discovery. Attorneys participated for Plaintiffs, and attorneys participated on behalf of the three defendants. Below is a summary of the negotiations that occurred.

Preservation Order: The parties are at an impasse on the scope of providers to whom Plaintiffs shall send letters to preserve medical records and the timing for which such letters shall be sent. The parties are drafting a joint submission to send to the Court next week.

Discovery: The parties briefly discussed the status of Plaintiffs' discovery requests to the Johnson & Johnson Defendants. Discussions will continue.

Next Meeting: The next meet and confer will be Wednesday, April 19th. The parties will keep the Court apprised of their progress on the issues above.

Andrew B. Joseph  
Partner responsible for  
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Honorable Freda L. Wolfson, U.S.D.J.  
Honorable Lois H. Goodman, U.S.M.J.  
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Thank you for your consideration of these matters.

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

*s/ Julie L. Tersigni*

Julie L. Tersigni

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